INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Federally Enforceable State Operating Permit (FESOP)

for Transco Railway Products, Inc. in Cass County

Permit No. F017-32758-00033

The Indiana Department of Environmental Management (IDEM) has received an application from Transco Railway Products, Inc. located at 1331 South 18th Street, Logansport, Indiana 46947 for a renewal of its FESOP issued on December 3, 2008. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Transco Railway Products, Inc. to continue to operate its existing rail and box car refurbishing operation.

This draft FESOP does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

A copy of the permit application and IDEM's preliminary findings are available at:

Logansport Public Library
616 Broadway
Logansport, IN 46947

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number **F017-32758-00033** in all correspondence.

Comments should be sent to:

Dominic Williams
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension (4-6555)
Or dial directly: (317) 234-6555
Fax: (317)-232-6749 attn: Dominic Williams
E-mail: dwilliam2@idem.in.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions please contact Dominic Williams of my staff at the above address.

Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality

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www.idem.IN.gov

DRAFT

Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Transco Railway Products, Inc.
1331 South 18th Street
Logansport, Indiana 46947

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No. F017-32758-00033	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary rail and box car refurbishing operation.

Source Address:	1331 South 18th Street, Logansport, Indiana 46947
General Source Phone Number:	574-753-6226
SIC Code:	4789
County Location:	Cass
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Two (2) paint rooms (#1 and #2), identified as EU-01, installed in April 1995 and January 1996, each equipped with high volume low pressure (HVLP) spray applicators and dry filters for overspray control, and various hand applicators, exhausting to stacks PR#1A and PR#1B for paint room #1 and stacks PR#2A and PR#2B for paint room #2, capacity: 0.125 rail cars per hour, each.

(b) Two (2) blast rooms (#1 and #2), identified as EU-02, installed in April 1995 and January 1996, each equipped with two (2) baghouses for PM control, exhausting through stacks BR1S1 and BR1S2 for blast room #1 and exhausting through stacks BR2S1 and BR2S2 for blast room #2, capacity: 0.125 rail cars per hour and 22,816 pounds of non-metallic abrasive per hour, total.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) Two (2) natural gas-fired boilers, located in paint room #1 (EU-01), identified as Paint #1a and Paint #1b, installed in 1993, with a maximum throughput capacity of 3 MMBtu/hr, each.

(b) Two (2) natural gas-fired boilers, located in paint room #2 (EU-01), identified as Paint #2a and Paint #2b, installed in 1995, with a maximum throughput capacity of 3 MMBtu/hr, each.

(c) One (1) natural gas-fired boiler, located in blast room #1 (EU-02), identified as Blast #1a, installed in 1993, with a maximum throughput capacity of 3 MMBtu/hr.

(d) One (1) natural gas-fired boiler, located in the Panel Building, identified as Panel 1a, installed in 1995, with a maximum throughput of capacity of 1 MMBtu/hr.

(e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of:

(1) One (1) open top cold cleaner degreaser, equipped with a cover, installed prior to 1980; and

(2) One (1) open top cold cleaner degreaser, equipped with a cover, installed after 1990.

(f) One (1) welding and flame cutting facility equipped with nine (9) metal inert gas (MIG) welding stations, thirty-one (31) stick welding stations and fifty-six (56) flame cutting stations.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F017-32758-00033, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F017-32758-00033 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Two (2) paint rooms (#1 and #2), identified as EU-01, installed in April 1995 and January 1996, each equipped with high volume low pressure (HVLP) spray applicators and dry filters for overspray control, and various hand applicators, exhausting to stacks PR#1A and PR#1B for paint room #1 and stacks PR#2A and PR#2B for paint room #2, capacity: 0.125 rail cars per hour, each.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP Limitations [326 IAC 2-8-4]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the total input of each single HAP to the paint rooms #1 and #2 (EU-01), including coatings, dilution solvents, and cleaning solvents, shall be less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period, and shall render the requirements of 40 CFR 63 Subpart MMMM, 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from paint rooms #1 and #2 (EU-01) shall be controlled by a dry filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.3 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

(a) Pursuant to 326 8-2-9, the Permittee shall not allow discharge into the atmosphere from Paint Rooms #1 and #2 (EU-01) VOCs in excess of three and five tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the two (2) applicators.

(b) Pursuant to 326 8-2-9(f), work practices in pant rooms #1 and #2 (EU-01), shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds and Hazardous Air Pollutant [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the HAP limitation contained in Condition D.1.1 and VOC limitation contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Particulate Control [326 IAC 6-3-2(d)]

In order to comply with Condition D.1.2, the dry filters for particulate control shall be in operation and control emissions from Paint Rooms #1 and #2 (EU-01) at all times these facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters associated with Paint Rooms #1 and #2 (EU-01). To monitor the performance of the dry filters, weekly observations shall be made of the overspray from each of the surface coating booth stacks (stacks PR#1A and PR#1B for paint room #1 and stacks PR#2A and PR#2B for paint room #2) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the each of the surface coating booth stacks (stacks PR#1A and PR#1B for paint room #1 and stacks PR#2A and PR#2B for paint room #2) and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.8 Record Keeping Requirements

(a) To document the compliance status of with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below for the two (2) paint rooms #1 and #2 (EU-01). Records maintained for (1) through (5) shall be taken as

stated below and shall be complete and sufficient to establish compliance with the VOC content limit and the HAP input limitation established in Conditions D.1.1 and D.1.3.

(1) The VOC and HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent used on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and mount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The cleanup solvent usage for each month.

(4) The highest single HAP input for each month.

(5) The highest single HAP input for each compliance period.

(b) To document the compliance status with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

(c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) Two (2) blast rooms (#1 and #2), identified as EU-02, installed in April 1995 and January 1996, each equipped with two (2) baghouses for PM control, exhausting through stacks BR1S1 and BR1S2 for blast room #1 and exhausting through stacks BR2S1 and BR2S2 for blast room #2, capacity: 0.125 rail cars per hour and 22,816 pounds of non-metallic abrasive per hour, total.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 FESOP and PSD Minor Limitations [326 IAC 2-8-4][326 IAC 2-2]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The combined PM10 emissions (after control) from the media blasting operations, Blast Rooms #1 and #2 (EU-02), shall not exceed 17.0 pounds per hour.

(b) The combined PM2.5 emissions (after control) from the media blasting operations, Blast Rooms #1 and #2 (EU-02), shall not exceed 17.0 pounds per hour.

Compliance with this limit, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per year, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.2 PSD Minor Limitation [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the combined PM emissions (after control) from the media blasting operations (EU-02) shall not exceed 49.0 pounds per hour.

Compliance with this limit, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per year, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions rate from the Blast Rooms #1 and #2 (EU-02) shall not exceed 10.1 and 15.9 pounds per hour, respectively, when operating at process weight rates of 3.86 and 7.54 tons per hour, respectively.

The pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and the associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.5 Particulate Control

(a) In order to comply with Condition D.2.1, D.2.2, and D.2.3, the baghouses for particulate control shall be in operation and control emissions from Blast Rooms #1 and #2 (EU-02) at all times that the Blast Rooms are in operation.

(b) In the event that bag failure is observed, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.6 Testing Requirements [326 IAC 2-1.1-11]

Not later than five (5) years from the date of the most recent valid compliance demonstration, in order to demonstrate compliance with Conditions D.2.1, D.2.2, and D.2.3, the Permittee shall perform PM, PM10, and PM2.5 testing on Blast Rooms #1 and #2 (EU-02) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.2.7 Visible Emissions Notations

(a) Visible emission notations of the baghouse exhausts associated with Blasting Rooms #1 and #2 (EU-02) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response shall be considered a deviation from this permit.

D.2.8 Parametric Monitoring

(a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the Blast Rooms #1 and #2 (EU-02) at least once per day when the associated

emissions units are in operation and venting to the atmosphere. When for any one reading, the pressure drop across either of the baghouses is outside the normal range, the Permittee shall take reasonable response. The normal range for each of the baghouses is a pressure drop between 2.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(b) The instruments used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.2.9 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.10 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.7, the Permittee shall maintain daily records of the visible emission notations of Blast Room stack (BR1S1, BR1S2, BR2S1, and BR2S2) exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

(b) To document compliance with Condition D.2.8, the Permittee shall maintain records once per day of the pressure drop of the control devices associated with each of the Blast Rooms. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

(c) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Two (2) natural gas-fired boilers, located in paint room #1 (EU-01), identified as Paint #1a and Paint #1b, installed in 1993, with a maximum throughput capacity of 3 MMBtu/hr, each.

(b) Two (2) natural gas-fired boilers, located in paint room #2 (EU-01), identified as Paint #2a and Paint #2b, installed in 1995, with a maximum throughput capacity of 3 MMBtu/hr, each.

(c) One (1) natural gas-fired boiler, located in blast room #1 (EU-02), identified as Blast #1a, installed in 1993, with a maximum throughput capacity of 3 MMBtu/hr.

(d) One (1) natural gas-fired boiler, located in the Panel Building, identified as Panel 1a, installed in 1995, with a maximum throughput of capacity of 1 MMBtu/hr.

(e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of:

(1) One (1) open top cold cleaner degreaser, equipped with a cover, installed prior to 1980; and

(2) One (1) open top cold cleaner degreaser, equipped with a cover, installed after 1990.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the Permittee shall comply with the following:

(a) Particulate emissions from boilers Paint #1a, Paint #1b, and Blast #1a shall not exceed 0.6 pound per million British thermal units heat input.

(b) Particulate emissions from boilers Paint #2a, Paint #2b, and Panel 1a, shall not exceed 0.53 pound per million British thermal units heat input.

These limitations were calculated using the following equation:

$$Pt = (1.09)/(Q^{0.26})$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. For boiler Paint #1a, Paint #1b, and Blast #1a, the total Q = 9.0 million British thermal units per hour, for boiler Paint #2a, Paint #2b, and Panel 1a, the total Q = 16.0 million British thermal units per hour.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

(a) Pursuant to 326 IAC 8-3-2, for cold cleaning degreaser operations constructed after January 1, 1980, the Permittee shall:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Pursuant to 8-3-2, the owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) A refrigerated chiller.

(D) Carbon adsorption.

(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:

(A) must be a solid, fluid stream; and

(B) shall be applied at a pressure that does not cause excessive splashing.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Transco Railway Products, Inc.
Source Address: 1331 South 18th Street, Logansport, Indiana 46947
FESOP Permit No.: F017-32758-00033

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Transco Railway Products, Inc.
Source Address: 1331 South 18th Street, Logansport, Indiana 46947
FESOP Permit No.: F017-32758-00033

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Transco Railway Products, Inc.
Source Address: 1331 South 18th Street, Logansport, Indiana 46947
FESOP Permit No.: F017-32758-00033
Facility: EU-01 (Paint Rooms #1 and #2)
Parameter: Single HAP Input
Limit: The total input of each single HAP to Paint Rooms #1 and #2 (EU-01), including coatings, dilution solvents, and cleaning solvents, shall be less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER:_____ YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Transco Railway Products, Inc.
Source Address: 1331 South 18th Street, Logansport, Indiana 46947
FESOP Permit No.: F017-32758-00033

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	**Transco Railway Products, Inc.**
Source Location:	**1331 South 18th Street, Logansport, Indiana 46947**
County:	**Cass**
SIC Code:	**4789 (Transportation Services, Not Elsewhere Classified)**
Permit Renewal No.:	**F017-32758-00033**
Permit Reviewer:	**Dominic Williams**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Transco Railway Products, Inc. relating to the continued operation of a stationary rail and box car refurbishing operation. On January 23, 2013, Transco Railway Products, Inc. submitted an application to the OAQ requesting to renew its operating permit. Transco Railway Products, Inc. transitioned from Title V to its initial FESOP (F017-25997-00033) on December 3, 2008.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) Two (2) paint rooms (#1 and #2), identified as EU-01, installed in April 1995 and January 1996, each equipped with high volume low pressure (HVLP) spray applicators and dry filters for overspray control, and various hand applicators, exhausting to stacks PR#1A and PR#1B for paint room #1 and stacks PR#2A and PR#2B for paint room #2, capacity: 0.125 rail cars per hour, each.

(b) Two (2) blast rooms (#1 and #2), identified as EU-02, installed in April 1995 and January 1996, each equipped with two (2) baghouses for PM control, exhausting through stacks BR1S1 and BR1S2 for blast room #1 and exhausting through stacks BR2S1 and BR2S2 for blast room #2, capacity: 0.125 rail cars per hour and 22,816 pounds of non-metallic abrasive per hour, total.

Insignificant Activities

The source also consists of the following insignificant activities:

(a) Two (2) natural gas-fired boilers, located in paint room #1 (EU-01), identified as Paint #1a and Paint #1b, installed in 1993, with a maximum throughput capacity of 3 MMBtu/hr, each.

(b) Two (2) natural gas-fired boilers, located in paint room #2 (EU-01), identified as Paint #2a and Paint #2b, installed in 1995, with a maximum throughput capacity of 3 MMBtu/hr, each.

(c) One (1) natural gas-fired boiler, located in blast room #1 (EU-02), identified as Blast #1a, installed in 1993, with a maximum throughput capacity of 3 MMBtu/hr.

(d) One (1) natural gas-fired boiler, located in the Panel Building, identified as Panel 1a, installed in 1995, with a maximum throughput of capacity of 1 MMBtu/hr.

(e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of:

(1) One (1) open top cold cleaner degreaser, equipped with a cover, installed prior to 1980; and

(2) One (1) open top cold cleaner degreaser, equipped with a cover, installed after 1990.

(f) One (1) welding and flame cutting facility equipped with nine (9) metal inert gas (MIG) welding stations, thirty-one (31) stick welding stations and fifty-six (56) flame cutting stations.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Cass County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Cass County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Cass County has been classified as attainment for $PM_{2.5}$. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct $PM_{2.5,}$ $SO_{2,}$ and NOx emissions were reviewed pursuant to the requirements for

Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Cass County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential (non-fugitive) emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	938.25
PM10	938.64
PM2.5	938.64
SO2	0.04
NOx	6.87
VOC	50.72
CO	5.77
GHGs as CO2e	8,295
Highest Single HAP	10.42 (Ethylene Glycol)
Total HAPs	13.04

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10, and PM2.5 are equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM10 and PM2.5 emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year.

(d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
EU-01: Paint rooms #1 and #2	3.36	3.36	3.36	0.0	0.0	49.87	0.0	0.0	12.88	<10.00 (Ethylene Glycol)
EU-02: Blast rooms #1 and #2	214.62	74.46	74.46	0.0	0.0	0.0	0.0	0.0	0.0	---
Natural Gas Combustion	0.13	0.52	0.52	0.04	6.87	0.38	5.77	8,295	0.13	0.12 (Hexane)
Degreasing Operations	0.0	0.0	0.0	0.0	0.0	0.47	0.0	0.0	0.0	---
Welding and Thermal Cutting	14.94	14.94	14.94	0.0	0.0	0.0	0.0	0.0	0.03	0.03 (Manganese)
Total PTE of Entire Source	**233.05**	**93.28**	**93.28**	**0.04**	**6.87**	**50.72**	**5.77**	**8,295**	**13.04**	**<10.00 (Ethylene Glycol)**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO_2e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO_2e	NA	NA
Unpaved Roads and Parking Lots (Fugitive)	3.66	0.93	0.93	0.0	0.0	0.0	0.0	0.0	0.0	---

negl. = negligible
*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.

(a) FESOP Status

This source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and the unrestricted potential to emit total HAP is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

(1) The input of each single HAP to paint rooms #1 and #2 (EU-01), including coatings, dilution solvents, and cleaning solvents, shall be less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) The combined PM10 emissions (after control) from the media blasting operations, Blast Rooms #1 and #2 (EU-02), shall not exceed 17.0 pounds per hour.

(3) The combined PM2.5 emissions (after control) from the media blasting operations, Blast Rooms #1 and #2 (EU-02), shall not exceed 17.0 pounds per hour.

Compliance with these limits, combined with the potential to emit PM10, PM2.5, and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per year, each, any single HAP to less than ten (10) tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

(b) PSD Minor Source
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit all attainment regulated criteria pollutants are limited to less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following:

(1) The combined PM emissions (after control) from the media blasting operations, Blast Rooms #1 and #2 (EU-02), shall not exceed 49.0 pounds per hour.

(2) The combined PM10 emissions (after control) from the media blasting operations, Blast Rooms #1 and #2 (EU-02), shall not exceed 17.0 pounds per hour.

(3) The combined PM2.5 emissions (after control) from the media blasting operations, Blast Rooms #1 and #2 (EU-02), shall not exceed 17.0 pounds per hour.

Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per year, the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per year, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Federal Rule Applicability

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, since the natural gas-fired boilers (Paint #1, Paint #2, Blast #1, and Panel) each have a heat input capacity of less than ten (10) MMBtu per hour.

(b) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since this source does not coat metal furniture.

(c) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source does not coat automobiles or light duty trucks.

(d) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (326 IAC 12), are not included in the permit, since this source does not coat pressure sensitive tape or labels.

(e) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), are not included in the permit, since this source does not coat large appliances.

(f) The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60, Subpart TT (326 IAC 12), are not included in the permit, since this source does not coat metal coils.

(g) The requirements of the New Source Performance Standard for the Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW (326 IAC 12), are not included in the permit, since this source does not coat beverage cans.

(h) The requirements of the New Source Performance Standard for Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT (326 IAC 12), are not included in the permit, since this source does not coat plastic parts for business machines.

(i) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63.460, Subpart T (326 IAC 20-6), are not included in the permit, since this source does not use solvents that contain methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroehtane, carbon tetrachloride, chloroform, or any combination of these as described in §63.460(a).

(k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Shipbuilding and Ship Repair (Surface Coating), 40 CFR 63.780, Subpart II (326 IAC 20-26), are not included in the permit, since this source does not coat ships and is not located in or part of a major source of HAPs.

(l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Automobiles and Light Duty Trucks, 40 CFR 63.3080, Subpart IIII (326 IAC 20-85), are not included in the permit, since this source does not coat automobiles or light duty trucks and is not located in or part of a major source of HAPs.

(m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Cans, 40 CFR 63.3480, Subpart KKKK (326 IAC 20-86), are not included in the permit, since this source does not coat metal cans and is not located in or part of a major source of HAPs.

(n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included in the permit, since this source has limited source wide HAP emissions to less than ten (<10) tons per for a single HAP, and twenty-five (<25) tons per year for any combination of HAPs making it an area source of HAPs and rendering Subpart MMMM not applicable.

(o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Large Appliances, 40 CFR 63.4080, Subpart NNNN (326 IAC 20-63), are not included in the permit, since this source does not coat large appliances and is not located in or part of a major source of HAPs.

(p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63.4480, Subpart PPPP (326 IAC 20-81), are not included in the permit, since this source does not coat plastic parts or products and is not located in or part of a major source of HAPs.

(q) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Wood Building Products, 40 CFR 63.4680, Subpart QQQQ (326 IAC 20-79), are not included in the permit, since this source does not coat wood building products and is not located in or part of a major source of HAPs.

(r) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Furniture, 40 CFR 63.4880, Subpart RRRR (326 IAC 20-78), are not included in the permit, since this source does not coat metal furniture and is not located in or part of a major source of HAPs.

(s) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Coil, 40 CFR 63.5080, Subpart SSSS (326 IAC 20-64), are not included in the permit, since this source does not coat metal coil and is not located in or part of a major source of HAPs.

(t) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95) are not included in the permit, because this source is not a major source of HAPs.

(u) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH (6H), are not included in the permit, since this source does not conduct a paint stripping operation, an automotive body refinishing operation, or use spray application coatings that contain compounds of chromium, lead, manganese, nickel, or cadmium.

(v) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the permit for the natural gas-fired boilers (Paint #1, Paint #2, Blast #1, and Panel), since gas-fired boilers, as defined in 40 CFR 63.11237, are specifically exempted from this rule, as indicated in 40 CFR 63.11195(e).

(w) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX (63.11514 through 63.11523), are not included in the permit, because the operations at this source fall under SIC code 4789 (NAICS code 488210), which is not one of the nine source categories listed in 40 CFR 63.11514 (see Federal Register, 73 FR 43000, July 23, 2008, for the list of NAICS codes for regulated source categories).

(x) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

(y) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

The following state rules are applicable to the source:

(a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is limited to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(d) 326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

(e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

(f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

(g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.

(h) 326 IAC 6.5 (PM Limitations Except Lake County)
This source is not subject to 326 IAC 6.5 because it is not located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne County.

(i) 326 IAC 6.8 (PM Limitations for Lake County)
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

(j) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

(k) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Individual Facilities

Surface Coating Operation (EU-01)

(a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2(d) are applicable to the two (2) paint rooms, #1 and #2 (EU-01), since they have the potential to use more than five (5) gallons of coating per day. Pursuant to 326 IAC 6-3-2, particulate from the two (2) paint rooms, #1 and #2 (EU-01) shall be controlled by dry particulate filter, waterwash, or equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
Pursuant to 326 IAC 8-1-6, the requirements of 326 IAC 8-1-6 are not applicable to the two (2) paint rooms, #1 and #2 (EU-01), since each of the two (2) paint rooms, #1 and #2 (EU-01), are subject to the requirements of 326 IAC 8-2-9.

(c) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-1(a)(4), this rule applies to facilities located in any county, constructed after July 1, 1990, which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls, and that perform surface coating of metal and/or plastic parts as specified in 326 IAC 8-2-9(a) and (b). The two (2) paint rooms, #1 and #2 (EU-01), are each subject to the requirements of 326 IAC 8-2-9, since each has potential VOC emissions of greater than fifteen (15) pounds of VOC per day before add-on controls and consists of the surface coating of rail and box car metal surfaces.

Pursuant to 326 8-2-9, the Permittee shall not allow discharge into the atmosphere from the two (2) paint rooms, #1 and #2 (EU-01), VOC in excess of three and five tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the two (2) applicators.

(1) Pursuant to 326 8-2-9(c)(2), the Permittee shall not allow discharge into the atmosphere from the two (2) paint rooms #1 and #2 (EU-01), VOC in excess of three and five tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the two (2) applicators.

(2) Pursuant to 326 8-2-9(f), work practices in pant rooms #1 and #2 (EU-01), shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

(A) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(B) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(C) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(D) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(E) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Media Blasting Operation (EU-02)

(d) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are applicable to the two (2) blast rooms, #1 and #2 (EU-02), since the two (2) blast rooms, #1 and #2 (EU-02), have potential particulate emissions greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-2, particulate emissions the two (2) blast rooms, #1 and #2 (EU-02), shall not exceed 10.1 and 15.9 pounds per hour, respectively, when operating at a process weight rate of 3.86 and 7.54 tons per hour, respectively.

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The four (4) baghouses shall be in operation at all times either of the two (2) blast rooms, #1 and #2 (EU-02), are in operation, in order to comply with this limit.

Degreasing Operations

(e) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The degreasing operation is not subject to the requirements of 326 IAC 8-1-6, since it is subject to the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-5.

(f) 326 IAC 8-3-2 (Cold Cleaner Degreaser Operation)
The degreasing operation was installed after January 1, 1980. Therefore, pursuant to 326 IAC 8-3-1(c)(1)(B), the requirements of 326 IAC 8-3-2 (Cold Cleaner Degreaser Operation) are applicable.

Pursuant to 326 IAC 8-3-2(a) (Cold Cleaner Degreaser Operation), the owner or operator of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

Pursuant to 8-3-2(b) (Cold Cleaner Degreaser Operation), the owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) A refrigerated chiller.

(D) Carbon adsorption.

(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:

(A) must be a solid, fluid stream; and

(B) shall be applied at a pressure that does not cause excessive splashing.

(g) 326 IAC 8-7 (VOC Rules; Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)
The degreasing operation is not subject to the requirements of 326 IAC 8-7, since it is not located in Lake, Porter, Clark, or Floyd County. It is located in Cass County.

(h) 326 IAC 8-17 (VOC Rules: Industrial Solvent Cleaning Operations)
The degreasing operation is not subject to the requirements of 326 IAC 8-17, since it is not located in Lake or Porter County and the total emissions are less than three (3) tons per twelve (12) months. It is located in Cass County and the total emissions are less than one (1) ton per twelve (12) months.

Natural Gas-fired Boilers

(i) 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)
The six (6) natural gas-fired boilers, identified as Paint #1a, Paint #1b, Paint #2a, Paint #2b, Blast #1a, and Panel 1a, were each constructed after September 21, 1983, and are each an indirect heating unit. Therefore, pursuant to 326 IAC 6-2-1(d), the requirements of 326 IAC 6-2-4 are applicable.

Each of the natural gas-fired boilers, identified as Paint #1a, Paint #1b, Paint #2a, Paint #2b, Blast #1a, and Panel 1a, must comply with the PM emission limitations of 326 IAC 6-2-4. This limitation is based on the following equation given in 326 IAC 6-2-4:

$Pt = (1.09) / (Q^{0.26})$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The PM limits are calculated based on the total source capacity at the time that each boiler was installed. Therefore, the Pt for each boiler is calculated as follows:

Boiler ID	Maximum Capacity (MMBtu/hr)	Construction Date	326 IAC 6-2-4 Allowable Particulate Emission Rate (lbs/MMBtu)
Paint #1a	3.00	1993	0.6
Paint #1b	3.00		
Blast #1a	3.00		
Paint #2a	3.00	1995	0.53
Paint #2b	3.00		
Panel 1a	1.00		

(1) For boilers Paint #1a, Paint #1b, and Blast #1a (each 3.0 MMBtu/hr, constructed in 1993), the total source maximum operating capacity rating Q is 9.0 MMBtu/hr. Since Q is less than 10 MMBtu/hr, Pt shall not exceed 0.6 pounds per million British thermal units heat input.

(2) For boilers Paint #2a, Paint #2b, and Panel 1a (3.0, 3.0, and 1.0 MMBtu/hr, constructed in 1995), the total source maximum operating capacity rating Q is 9.0 + 7.0 = 16.0 MMBtu/hr. Therefore the 326 IAC 6-2-4 Allowable Particulate Emission Rate (lbs/MMBtu) (Pt) is:

$Pt = (1.09)/(16.0^{.26}) = 0.53$ lb/MMBtu

Therefore, particulate emissions from boilers Paint #2a, Paint #2b, and Panel 1a shall not exceed 0.53 pounds per million British thermal units heat input.

Based on Appendix A and AP-42, the potential to emit PM from the six (6) natural gas-fired boilers are calculated as follows:

For natural gas combustion in boilers Paint #1a, Paint #1b, Paint #2a, Paint #2b, Blast #1a, and Panel 1a:

1.90 lb PM/MMCF x 1 MMCF/1,000 MMBtu = 0.002 lb PM/MMBtu

Therefore boilers Paint #1a, Paint #1b, Paint #2a, Paint #2b, Blast #1a, and Panel 1a are able to comply with this rule without the use of a control device.

Welding and Thermal Cutting

(j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(9) and 326 IAC 6-3-1(10), each of the welding and flame cutting units are exempt from 326 IAC 6-3 since each welding unit consumes less than 625 pounds of rod or wire per day, and each cutting torch cuts less than 3,400 inches per hour of stock one (1) inch in thickness or greater.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

(a) The compliance monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Control Device	Monitoring Frequency and Operating Parameters
Paint Rooms #1 and #2 (EU-01)	Dry Filters	1. Daily inspections of filters; 2. Weekly overspray observations of stacks; and 3. Monthly inspections of stacks for presence of overspray on the rooftops and the nearby ground
Media Blasting Operation	Two (2) baghouses	Once per day visible emission observations from each of the Blast Room stack exhaust for BR1S1, BR1S2, BR2S1 and BR2S2 while the units are in operation.
Media Blasting Operation	Two (2) baghouses	Once per day pressure drop observations from each of the Blast Room stack exhaust for BR1S1, BR1S2, BR2S1 and BR2S2 while the units are in operation.

(b) The testing requirements applicable to this source are as follows:

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing
Media Blasting Operation	Baghouse	Five (5) years since the latest valid stack test	PM, PM10, andPM2.5	Every 5 years

These monitoring and testing conditions are necessary because the baghouses for the Media Blasting Operation (EU-02) and the dry filters for Paint Rooms #1 and #2 (EU-01) must operate

properly to ensure compliance with 326 IAC 6-3 (Process Operations), 326 IAC 2-8 (FESOP), and to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

The most recent stack test for Blast Room #1 was conducted on October 3, 2012. The most recent stack test for Blast Room #2 was conducted on October 4, 2012. Transco Railway Products, Inc. was determined to be in compliance in each test.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 23, 2013. Additional information was received on February 11, 2013.

Conclusion

The operation of this stationary rail and box car refurbishing operation shall be subject to the conditions of the attached FESOP Renewal No. F017-32758-00033.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Dominic Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6555 or toll free at 1-800-451-6027 extension 4-6555.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations
Emissions Summary

Company Name: Transco Railway Products, Inc.
Source Address: 1331 South 18th Street, Logansport, Indiana 46947
Permit Number: F017-32758-00033
Reviewer: Dominic Williams

Unlimited/Uncontrolled Potential Emissions (tons/year)

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Non-Fugitive Emissions											
EU-01 (Surface Coat)	67.20	67.20	67.20	-	-	49.87	-	-	12.88	10.42	Ethylene Glycol
EU-02 (Shot Blast)	856	856	856	-	-	-	-	-	-	-	
Natural Gas Combustion	0.13	0.52	0.52	0.04	6.87	0.38	5.77	8295	0.13	0.12	Hexane
Degreasing Operations	-	-	-	-	-	0.47	-	-	-	-	
Welding and Thermal Cutting	14.94	14.94	14.94	-	-	-	-	-	0.03	0.03	Manganese
Total Non-Fugitive Emissions*	**938.25**	**938.64**	**938.64**	**0.04**	**6.87**	**50.72**	**5.77**	**8295**	**13.04**	**10.42**	**Ethylene Glycol**
Fugitive Emissions											
Unpaved Roads and Parking Lots**	5.57	1.42	1.42	-	-	-	-	-	-	-	
Total Fugitive Emissions*	**5.57**	**1.42**	**1.42**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	
Total Non-Fugitive and Fugitive Emissions*	**943.82**	**940.06**	**940.06**	**0.04**	**6.87**	**50.72**	**5.77**	**8295**	**13.04**	**10.42**	**Ethylene Glycol**

Limited Potential Emissions (tons/year)

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Non-Fugitive Emissions											
EU-01 (Surface Coat)	3.36	3.36	3.36	-	-	49.87	-	-	12.88	< 10.0	Ethylene Glycol
EU-02 (Shot Blast)	214.62	74.46	74.46	-	-	-	-	-	-	-	
Natural Gas Combustion	0.13	0.52	0.52	0.04	6.87	0.38	5.77	8295	0.13	0.12	Hexane
Degreasing Operations	-	-	-	-	-	0.47	-	-	-	-	
Welding and Thermal Cutting	14.94	14.94	14.94	-	-	-	-	-	0.03	0.03	Manganese
Total Non-Fugitive Emissions*	**233.05**	**93.28**	**93.28**	**0.04**	**6.87**	**50.72**	**5.77**	**8295**	**13.04**	**< 10.00**	**Ethylene Glycol**
Fugitive Emissions											
Unpaved Roads and Parking Lots**	3.66	0.93	0.93	-	-	-	-	-	-	-	
Total Fugitive Emissions*	3.66	0.93	0.93	-	-	-	-	-	-	-	
Total Non-Fugitive and Fugitive Emissions*	**236.71**	**94.21**	**94.21**	**0.04**	**6.87**	**50.72**	**5.77**	**8295**	**13.04**	**< 10.00**	**Ethylene Glycol**

Limited/Controlled Potential Emissions (tons/year)

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Non-Fugitive Emissions											
EU-01 (Surface Coat)	3.36	3.36	3.36	-	-	49.87	-	-	12.88	< 10.0	Ethylene Glycol
EU-02 (Shot Blast)	4.28	4.28	4.28	-	-	-	-	-	-	-	
Natural Gas Combustion	0.13	0.52	0.52	0.04	6.87	0.38	5.77	8295	0.13	0.12	Hexane
Degreasing Operations	-	-	-	-	-	0.47	-	-	-	-	
Welding and Thermal Cutting	14.94	14.94	14.94	-	-	-	-	-	0.03	0.03	Manganese
Total Non-Fugitive Emissions*	**22.71**	**23.10**	**23.10**	**0.04**	**6.87**	**50.72**	**5.77**	**8295**	**13.04**	**< 10.00**	**Ethylene Glycol**
Fugitive Emissions											
Unpaved Roads and Parking Lots**	3.66	0.93	0.93	-	-	-	-	-	-	-	
Total Fugitive Emissions*	3.66	0.93	0.93	-	-	-	-	-	-	-	
Total Non-Fugitive and Fugitive Emissions*	**26.37**	**24.03**	**24.03**	**0.04**	**6.87**	**50.72**	**5.77**	**8295**	**13.04**	**< 10.00**	**Ethylene Glycol**

Notes

*Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability. The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-8 (Federally Enforceable State Operating Permit) applicability.

**Mitigated PTE (tons/yr) is taking natural mitigation due to precipitation into consideration.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Transco Railway Products, Inc.
Source Address: 1331 South 18th Street, Logansport, Indiana 46947
Permit Number: F017-32758-00033
Reviewer: Dominic Williams

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU 01																
Paint Room #1																
W. Hayward Primer	9.84	52.74%	44.81%	7.93%	52.84%	37.71%	40.00	0.125	1.65	0.78	3.90	93.64	17.09	25.46	2.07	75.0%
W. Hayward Yellow	9.14	55.25%	48.48%	6.77%	53.08%	38.03%	40.00	0.125	1.32	0.62	3.09	74.25	13.55	22.39	1.63	75.0%
W. Hayward MOP Yellow	9.05	60.55%	47.07%	13.48%	51.05%	35.90%	15.00	0.125	2.49	1.22	2.29	54.90	10.02	7.33	3.40	75.0%
W. Hayward Roof Gray	9.53	52.78%	47.85%	4.93%	55.72%	38.65%	15.00	0.125	1.06	0.47	0.88	21.14	3.86	9.24	1.22	75.0%
Total Paint Room #1											**10.16**	**243.93**	**44.52**	**64.42**		
Paint Room #2																
Carboline 875	13.53	8.80%	0.00%	8.80%	0.00%	83.50%	1.00	0.125	1.19	1.19	0.15	3.57	0.65	1.69	1.43	75.0%
MEK	6.68	100.00%	0.00%	100.00%	0.00%	0.00%	0.25	0.125	6.68	6.68	0.21	5.01	0.91	0.00	N/A	75.0%
Carboline 875 (as applied)	12.16	18.82%	0.00%	18.82%	0.00%	74.34%	1.00	0.125	2.29	2.29	0.29	6.87	1.25	1.35	3.08	75.0%
Carboline 876	14.34	9.10%	0.00%	9.10%	0.00%	81.60%	1.00	0.125	1.30	1.30	0.16	3.91	0.71	1.78	1.60	75.0%
MEK	6.68	100.00%	0.00%	100.00%	0.00%	0.00%	0.25	0.125	6.68	6.68	0.21	5.01	0.91	0.00	N/A	75.0%
Carboline 876 (as applied)	12.81	18.61%	0.00%	18.61%	0.00%	73.08%	1.00	0.125	2.38	2.38	0.30	7.15	1.31	1.43	3.26	75.0%
W. Hayward White	9.49	57.32%	51.53%	5.79%	58.59%	34.59%	3.00	0.125	1.33	0.55	0.21	4.95	0.90	1.66	1.59	75.0%
W. Hayward NS Red Brown	8.75	59.54%	51.89%	7.65%	54.40%	36.46%	3.00	0.125	1.47	0.67	0.25	6.02	1.10	1.45	1.84	75.0%
Valspar Blue	13.64	17.94%	0.00%	17.94%	0.00%	64.52%	1.00	0.125	2.45	2.45	0.31	7.34	1.34	1.53	3.79	75.0%
MEK	6.68	100.00%	0.00%	100.00%	0.00%	0.00%	0.25	0.125	6.68	6.68	0.21	5.01	0.91	0.00	N/A	75.0%
Valspar Blue (as applied)	12.25	26.89%	0.00%	26.89%	0.00%	57.49%	1.00	0.125	3.29	3.29	0.41	9.88	1.80	1.23	5.73	75.0%
Valspar Cure	8.43	22.79%	0.00%	22.79%	0.00%	77.94%	1.00	0.125	1.92	1.92	0.24	5.76	1.05	0.89	2.46	75.0%
MEK	6.68	100.00%	0.00%	100.00%	0.00%	0.00%	0.25	0.125	6.68	6.68	0.21	5.01	0.91	0.00	N/A	75.0%
Valspar Cure (as applied)	8.08	35.54%	0.00%	35.54%	0.00%	65.05%	1.00	0.125	2.87	2.87	0.36	8.61	1.57	0.71	4.41	75.0%
Worst Case Paint Room #2[1]											**0.77**	**18.50**	**3.38**	**2.78**		
Clean-Up Solvent																
MEK	7.24	100.00%	0.00%	100%	0.00%	0.00%	0.50	0.125	7.24	7.24	0.45	10.9	2.0	0.00	N/A	75.0%

PM Control Efficiency: 95.0%

	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)
Total Uncontrolled PTE	**11.39**	**273.29**	**49.87**	**67.20**
Total Controlled PTE	**11.39**	**273.29**	**49.87**	**3.36**

Methodology
Note[1]: Worst Case Paint Room #2 VOC was calculated by adding the worst case coating (Valspar Blue) to the curing agent (Valsapr Cure) which is sprayed on after the color-type coating.
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Transco Railway Products, Inc.
Source Address: 1331 South 18th Street, Logansport, Indiana 46947
Permit Number: F017-32758-00033
Reviewer: Dominic Williams

Material	Density (Lb/Gal)	Gallons of Material (Gal/Unit)	Maximum (Units/Hour)	Weight % Xylene Compounds	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene Compounds	Weight % Cumene	Weight % Naphtalene	Weight % Dibutylphthlate	Weight % Ethylene Glycol	Weight % Methyl Isobutyl Keytone	Xylene Compound Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Compound Emissions (ton/yr)	Cumene Emissions (ton/yr)	Naphtalene Emissions (ton/yr)	Dibutylphthlate Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Methyl Isobutyl Keytone Emissions (ton/yr)	**Combined HAP Emissions (ton/yr)**
EU01																						
Paint Room #1																						
W. Hayward Primer	9.84	40.00	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.20%	0.00%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.90	0.0	**6.90**
W. Hayward Yellow	9.14	40.00	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.00	0.0	**2.00**
W. Hayward MOP Yellow	9.05	15.00	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.74	0.0	**0.74**
W. Hayward Roof Gray	9.53	15.00	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.78	0.0	**0.78**
Total Paint Room #1															**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**10.42**	**0.00**	**10.42**
Paint Room #2																						
Carboline 875 (as applied)	12.16	1.00	0.125	0.45%	0.00%	0.00%	0.11%	0.03%	0.00%	0.00%	0.00%	0.00%	0.030	0.0	0.0	0.007	0.002	0.0	0.0	0.0	0.0	**0.04**
Carboline 876 (as applied)	12.81	1.00	0.125	35.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.455	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**2.45**
W. Hayward White	9.49	3.00	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**0.0**
W. Hayward NS Red Brown	8.75	3.00	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.60%	0.00%	0.00%	0.0	0.0	0.0	0.0	0.0	0.0	0.230	0.0	0.0	**0.23**
Valspar Blue (as applied)	12.25	1.00	0.125	0.95%	0.02%	0.02%	0.20%	0.00%	0.00%	0.00%	0.00%	1.34%	0.064	0.001	0.001	0.013	0.0	0.0	0.0	0.0	0.090	**0.17**
Valspar Cure (as applied)	8.08	1.00	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**0.0**
Worst Case Paint Room #2[1]													**2.45**									**2.45**

Total Surface Coating HAPs	**12.88**

Methodology
Note[1]: Worst Case Paint Room #2 HAP was calculated by adding the worst case coating (W. Hayward White) to the curing agent (Valsapr Cure) which is sprayed on after the color-type coating.
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Shot Blast and Baghouse Operation for Blast Rooms #1 and #2

Company Name: **Transco Railway Products, Inc.**
Source Address: **1331 South 18th Street, Logansport, Indiana 46947**
Permit Number: **F017-32758-00033**
Reviewer: **Dominic Williams**

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic Foot of Outlet Air (grains/ft³)	Gas or Air Flow Rate (acfm)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
EU02							
BR1S1	99.5%	0.0033	15000	84.9	372	0.424	1.86
BR1S2	99.5%	0.0033	15000	84.9	372	0.424	1.86
BR2S1	99.5%	0.0005	15000	12.9	56.3	0.064	0.282
BR2S2	99.5%	0.0005	15000	12.9	56.3	0.064	0.282
			PM	**195**	**856**	**0.977**	**4.28**
			PM10/PM2.5	**195**	**856**	**0.977**	**4.28**

Methodology
PM10 assumed to equal PM2.5.
Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

326 IAC 6-3-2 Allowable Rate of Emissions

	Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lb/hr)	Allowable Emissions (tons/yr)	Control Device Required to Meet Limit?
Blast Room #1	7728	3.86	10.1	44.4	Yes
Blast Room #2	15088	7.54	15.9	69.5	Yes
		Total	**26.0**	**114**	

Methodology
Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate up to sixty thousand (60,000) pounds per hour:

$E = 4.10\ P^{0.67}$

where

E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Appendix A: Emission Calculations
Natural Gas Combustion Only
Capacity <100 MMBtu/hr

Company Name: **Transco Railway Products, Inc.**
Source Address: **1331 South 18th Street, Logansport, Indiana 46947**
Permit Number: **F017-32758-00033**
Reviewer: **Dominic Williams**

Unit	Maximum Heat Input Capacity (MMBtu/hr)	Number of Units	High Heat Value (MMBtu/MMscf	Potential Throughput (MMcf/yr)
Paint #1 (x2)	3.00	2	1020	51.53
Paint #2 (x2)	3.00	2	1020	51.53
Blast #1 (x1)	3.00	1	1020	25.76
Panel (x1)	1.00	1	1020	8.59
Totals	**16.00**			**137.41**

Criteria Pollutants

Pollutant	PM*	PM10*	PM2.5*	SO2	NOx**	VOC	CO
Emission Factor in lb/MMcf	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.13	0.52	0.52	0.041	6.87	0.38	5.77

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 assumed equal to PM10
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Hazardous Air Pollutants	HAPs - Organics*				
Pollutant	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.44E-04	8.24E-05	5.15E-03	0.124	2.34E-04

*The five highest organic HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Hazardous Air Pollutants	HAPs - Metals*						
Pollutant	As	Cd	Cr	Hg	Mn	Ni	Pb
Emission Factor in lb/MMcf	2.0E-04	1.1E-03	1.4E-03	2.6E-04	3.8E-04	2.1E-03	5.0E-04
Potential Emission in tons/yr	1.37E-05	7.56E-05	9.62E-05	1.79E-05	2.61E-05	1.44E-04	3.44E-05

*The seven highest metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Potential to Emit Total HAPs (tons/year) **0.130**

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Greenhouse Gases (GHGs)

Greenhouse Gas	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	8244.71	0.16	0.15
Summed Potential Emissions in tons/yr	8245.02		
CO2e Total in tons/yr	8294.88		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N20 GWP (310).

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
SO2 = Sulfur Dioxide
NOx = Nitrous Oxides
VOC - Volatile Organic Compounds
CO = Carbon Monoxide
As = Arsenic
Cd = Cadmium
Cr = Chromium
Hg = Mercury
Mn = Manganese
Ni = Nickel
Pb = Lead
CO2 = Cabon Dioxide
CH4 = Methane
N2O = Nitrous Oxide
CO2e = CO2 equivalent emissions

Appendix A: Emissions Calculations
Potential to Emit from
Degreasing Operations

Company Name: **Transco Railway Products, Inc.**
Source Address: **1331 South 18th Street, Logansport, Indiana 46947**
Permit Number: **F017-32758-00033**
Reviewer: **Dominic Williams**

VOC Emissions

Unit	Max. Annual Solvent Usage (gal/yr)	VOC Content (lb/gal)	VOC Potential Emissions (ton/yr)
G&G Mineral Spirits (CAS No. 8052-41-3)	145	6.43	0.47
		Total	**0.47**

Methodology
*VOC Content (lbs/gal) from MSDS
[VOC Potential Emissions (tons/yr)] = [Maximum Annual Solvent Usage (gal/yr)] * [VOC Content (lbs/gal)] / [2000 (lbs/ton)]

Appendix A: Emissions Calculations
Insignificant Welding and Thermal Cutting

Company Name: Transco Railway Products, Inc.
Source Address: 1331 South 18th Street, Logansport, Indiana 46947
Permit Number: F017-32758-00033
Reviewer: Dominic Williams

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Max. electrode consumption per station (lbs/day)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING					PM = PM10/PM2.5	Mn	Ni	Cr	PM = PM10/PM2.5	Mn	Ni	Cr	
Metal Inert Gas (MIG)(carbon steel)	9.00	0.200	4.800		5.50E-03	5.00E-04	0.00	0.00	0.010	0.001	0.00	0.00	0.001
Stick (E7018 electrode)	31.0	0.200	4.800		0.0211	9.00E-04	0.00	0.00	0.131	0.006	0.00	0.00	0.006
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	Max. Metal Cutting Rate (in./hour)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
FLAME CUTTING					PM = PM10/PM2.5	Mn	Ni	Cr	PM = PM10/PM2.5	Mn	Ni	Cr	
Oxygen and Propylene	56.0	0.500	12.0	720.0	0.1622	5.00E-04	1.00E-04	3.00E-04	3.27	2.92E-05	5.84E-09	1.46E-13	2.92E-05
EMISSION TOTALS													
Potential Emissions lbs/hr									3.41	0.007	5.84E-09	1.460E-13	0.007
Potential Emissions lbs/day									81.9	0.156	1.40E-07	3.50E-12	0.156
Potential Emissions tons/year									14.9	0.029	2.56E-08	6.39E-13	0.029

Methodology

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculting the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: **Transco Railway Products, Inc.**
Source Address: **1331 South 18th Street, Logansport, Indiana 46947**
Permit Number: **F017-32758-00033**
Reviewer: **Dominic Williams**

Unpaved Roads at Industrial Site
The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Passenger Car (entering plant) (one-way trip)	70.0	1.0	70.0	2.0	140.0	500	0.095	6.6	2419.5
Passender Car (leaving plant) (one-way trip)	70.0	1.0	70.0	2.0	140.0	500	0.095	6.6	2419.5
Semi-truck (entering plant) (one-way trip)	3.0	1.0	3.0	5.0	15.0	500	0.095	0.3	103.7
Semi-truck (leaving plant) (one-way trip)	3.0	1.0	3.0	5.0	15.0	500	0.095	0.3	103.7
		Total	**146.0**		**310.0**			**13.8**	**5046.4**

Average Vehicle Weight Per Trip = 2.1 tons/trip
Average Miles Per Trip = 0.09 miles/trip

Unmitigated Emission Factor, Ef = k*[(s/12)^a]*[(W/3)^b] (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	1.5	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	2.1	2.1	2.1	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365] (Equation 2 from AP-42 13.2.2)
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	2.21	0.56	0.56	lb/mile
Mitigated Emission Factor, Eext =	1.45	0.37	0.37	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Passenger Car (entering plant) (one-way trip)	2.67	0.68	0.68	1.76	0.45	0.45
Passender Car (leaving plant) (one-way trip)	2.67	0.68	0.68	1.76	0.45	0.45
Semi-truck (entering plant) (one-way trip)	0.11	0.03	0.03	0.08	0.02	0.02
Semi-truck (leaving plant) (one-way trip)	0.11	0.03	0.03	0.08	0.02	0.02
	5.57	**1.42**	**1.42**	**3.66**	**0.93**	**0.93**

Methodology
Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

April 8, 2013

Mr. Eric Nichols
Transco Railway Products, Inc.
PO Box 709
1331 S 18th Street
Logansport, IN 46947

Re: Public Notice
Transco Railway Products, Inc.
Permit Level: FESOP Renewal
Permit Number: 017-32758-00033

Dear Mr. Nichols:

Enclosed is a copy of your draft FESOP Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Logansport Public Library, 616 Broadway in Logansport, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Pharos Tribune in Logansport, Indiana publish this notice no later than April 11, 2013.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Dominic Williams, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6555 or dial (317) 234-6555.

Sincerely,

Greg Hotopp
Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter. dot 3/27/08

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Notice of Public Comment

April 8, 2013
Transco Railway Products, Inc.
017-32758-00033

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 3/27/08

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Indianapolis, Indiana 46204
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Toll Free (800) 451-6027
www.idem.IN.gov

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

April 8, 2013

Pharos Tribune
517 East Broadway
PO Box 210
Logansport, IN 46947

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Transco Railway Products, Inc., Cass County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than April 11, 2013.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

Greg Hotopp
Greg Hotopp
Permit Branch
Office of Air Quality

cc: Pat Cuzzort: OAQ Billing, Licensing and Training Section
Permit Level: FESOP Renewal
Permit Number: 017-32758-00033

Enclosure
PN Newspaper.dot 3/27/08

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April 8, 2013

To: Logansport Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Transco Railway Products, Inc.
Permit Number: 017-32758-00033

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 03/27/08

Mail Code 61-53

IDEM Staff	GHOTOPP 4/8/2013 Transco Railway Products, Inc 017-32758-00033 Draft		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Eric Nichols Transco Railway Products, Inc PO Box 709, 1331 S 18th St Logansport IN 46947 (Source CAATS)									
2		Harold Fitz Dir Regulatory Compliance Transco Railway Products, Inc PO Box 231, 820 Hopley Ave Bucyrus OH 44820 *(RO CAATS)*									
3		Mr. Harry D. DuVall P.O. Box 147 Idaville IN 47950 *(Affected Party)*									
4		Cass County Board of Commissioner 200 Court Park Logansport IN 46947 *(Local Official)*									
5		Cass County Health Department 512 High Street Logansport IN 46947-2766 *(Health Department)*									
6		Logansport Cass Co Public Library 616 E Broadway Logansport IN 46947-3187 *(Library)*									
7		Logansport City Council and Mayors Office 601 Broadway Logansport IN 46947 *(Local Official)*									
8		Mr. Robert Kelley 2555 S 30th Street Lafayette IN 44909 *(Affected Party)*									
9		Mr. Tim Thomas c/o Boilermakers Local 374 6333 Kennedy Ave. Hammond IN 46333 *(Affected Party)*									
10		Kurt Brandstatter Central Paving, Inc. P.O. Box 357 Logansport IN 46947 *(Affected Party)*									
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